

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, JOHN  
MEINERS, and DANIEL UMPA, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

NATIONAL ASSOCIATION OF  
REALTORS, et al.,

Defendants.

Civil Action No. 4:23-cv-00788-SRB

[Consolidated with 4:23-cv-00945-SRB]

Hon. Stephen R. Bough

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION TO STAY CASE AS TO  
DEFENDANT HANNA HOLDINGS, INC.**

Plaintiffs Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively “Plaintiffs”) and Defendant Hanna Holdings, Inc. (“Hanna Holdings” and, together with Plaintiffs, the “Parties”), respectfully write to provide the Court with notice that the Parties have reached an agreement in principle to settle all claims asserted against Hanna Holdings in this action as part of a proposed nationwide class settlement. This agreement is subject to the Court’s approval under Rule 23 of the Federal Rule of Civil Procedure.

Plaintiffs and Hanna Holdings hereby jointly stipulate and request that the Court stay all deadlines and proceedings solely as to Hanna Holdings to preserve the resources of Plaintiffs, Hanna Holdings, and the Court, and to seek approval of the settlement. The Parties agree that this Notice and the stay requested herein shall not constitute a waiver of any defenses, including but not limited to: (a) any jurisdictional defenses that may be available under Rule 12 of the Federal Rules of Civil Procedure, statutory law, or common law (including but not limited to personal jurisdiction defenses), (b) any affirmative defenses that may be available under Rule 8 of the Federal Rules of Civil Procedure, statutory law, or common law, or (c) any other statutory or common law defenses that may be available to Hanna Holdings in this or any other related actions.

Dated: May 2, 2025

Respectfully submitted by:

**HAGENS BERMAN SOBOL SHAPIRO  
LLP**

**WILMER CUTLER PICKERING  
HALE AND DORR LLP**

/s/ Steve W. Berman

Steve W. Berman (*pro hac vice*)  
1301 Second Avenue, Suite 2000  
Seattle, WA 98101  
Telephone: (206) 623-7292  
steve@hbsslaw.com

Rio S. Pierce (*pro hac vice*)  
715 Hearst Avenue, Suite 300  
Berkeley, CA 94710

/s/ David Z. Gringer

David Z. Gringer (*pro hac vice*)  
Emily Barnet (*pro hac vice*)  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
(212) 230-8800  
david.gringer@wilmerhale.com  
emily.barnet@wilmerhale.com

Telephone: (510) 725-3000  
riop@hbsslaw.com

Jeannie Evans (*pro hac vice*)  
Nathan Emmons (MO # 70046)  
455 North Cityfront Plaza Drive, Suite 2410  
Chicago, IL 60611  
Telephone: (708) 628-4949  
jeannie@hbsslaw.com  
nathane@hbsslaw.com

**COHEN MILSTEIN SELLERS &  
TOLL PLLC**

Benjamin D. Brown (*pro hac vice*)  
Robert A. Braun (*pro hac vice*)  
Sabrina Merold (*pro hac vice*)  
1100 New York Ave. NW, Suite 800  
Washington, DC 20005  
Telephone: (202) 408-4600  
bbrown@cohenmilstein.com  
rbraun@cohenmilstein.com  
smerold@cohenmilstein.com

Daniel Silverman (*pro hac vice*)  
769 Centre Street, Suite 207  
Boston, MA 02130  
Telephone: (617) 858-1990  
dsilverman@cohenmilstein.com

**BOULWARE LAW LLC**

Brandon J.B. Boulware (MO # 54150)  
Jeremy M. Suhr (MO # 60075)  
Erin D. Lawrence (MO # 63021)  
1600 Genessee Street, Suite 416  
Kansas City, MO 64102  
Tel: (816) 492-2826  
Fax: (816) 492-2826  
brandon@boulware-law.com  
jeremy@boulware-law.com  
erin@boulware-law.com

**KETCHMARK AND MCCREIGHT P.C.**

Michael Ketchmark (MO # 41018)  
Scott McCreight (MO # 44002)  
11161 Overbrook Rd. Suite 210

Seth P. Waxman (*pro hac vice*)  
Karin Dryhurst (*pro hac vice*)  
Claire Bergeron (*pro hac vice*)  
2100 Pennsylvania Avenue NW  
Washington, DC 20037  
(202) 663-6000  
seth.waxman@wilmerhale.com  
karin.dryhurst@wilmerhale.com  
claire.bergeron@wilmerhale.com

**SHOOK, HARDY & BACON LLP**

Robert Adams (MO #34612)  
Michael S. Cargnel (MO #52631)  
Hannah M. Smith (MO #73949)  
2555 Grand Blvd.  
Kansas City, MO 64108  
(816) 559-2101  
rtadams@shb.com  
mcargnel@shb.com  
hsmith@shb.com

**PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP**

John Brumberg (*pro hac vice forthcoming*)  
William Pietragallo II (*pro hac vice  
forthcoming*)  
Quintin DiLucente (*pro hac vice forthcoming*)  
One Oxford Centre, 38th Fl.  
Pittsburgh, PA 15219  
(412) 263-1836  
JRB@Pietragallo.com  
WP@Pietragallo.com  
QD@Pietragallo.com

*Attorneys for Hanna Holdings, Inc.*

Leawood, Kansas 66211  
Tel: (913) 266-4500  
mike@ketchmclaw.com  
smccreight@ketchmclaw.com

**WILLIAMS DIRKS DAMERON LLC**

Michael A. Williams (MO # 47538)  
Matthew L. Dameron (MO # 52093)  
Eric L. Dirks (MO # 54921)  
1100 Main Street, Suite 2600  
Kansas City, MO 64105  
Tel: (816) 945 7110  
Fax: (816) 945-7118  
mwilliams@williamsdirks.com  
matt@williamsdirks.com  
dirks@williamsdirks.com

**SUSMAN GODFREY L.L.P.**

Marc M. Seltzer (*pro hac vice*)  
Steven G. Sklaver (*pro hac vice*)  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, California 90067  
Telephone: (310) 789-3100  
mseltzer@susmangodfrey.com  
ssklaver@susmangodfrey.com

Beatrice C. Franklin (*pro hac vice*)  
One Manhattan West  
New York, New York 10001  
Telephone: (212) 336-8330  
bfranklin@susmangodfrey.com

Matthew R. Berry (*pro hac vice*)  
Floyd G. Short (*pro hac vice*)  
Alexander W. Aiken (*pro hac vice*)  
401 Union St., Suite 3000  
Seattle, Washington 98101  
Telephone: (206) 516-3880  
mberry@susmangodfrey.com  
fshort@susmangodfrey.com  
aaiken@susmangodfrey.com

***Attorneys for Plaintiffs and the Class***

**CERTIFICATE OF SERVICE**

The undersigned attorney of record hereby certifies that on May 2, 2025, a true and correct copy of the foregoing was filed electronically by the Court's CM/ECF system, which caused notice and a copy of this filing to be sent to all counsel of record.

Dated: May 2, 2025

/s/ Steve W. Berman

Steve W. Berman